## ORAL DEPOSITION OF SUSI VASSALLO, M.D.

```
IN THE UNITED STATES DISTRICT COURT
1
               FOR THE NORTHERN DISTRICT OF TEXAS
                          DALLAS DIVISION
2
3
    STEPHEN McCOLLUM, et al.,
              Plaintiffs,
4
                                  CIVIL ACTION
    v.
5
                                  NO. 3:12-CV-02037
6
    BRAD LIVINGSTON, et al.,
              Defendants.
7
8
9
                          ORAL DEPOSITION
                        SUSI VASSALLO, M.D.
10
                           March 5, 2014
11
12
13
14
15
        ORAL DEPOSITION OF SUSI VASSALLO, M.D., produced as
    a witness at the instance of the Defendant UTMB and duly
16
17
    sworn, was taken in the above-styled and numbered cause
18
    on the 5th day of March, 2014, from 10:03 a.m. to
19
    5:06 p.m., before Dalia F. Inman, Certified Shorthand
    Reporter in and for the State of Texas, reported by
20
21
    computerized stenotype machine at the offices of The
22
    Edwards Law Firm, 1101 E. 11th Street, Austin, Texas
23
    78702, pursuant to the Federal Rules of Civil Procedure
24
    and the provisions stated on the record or attached
25
    hereto.
                          DEFENDANT'S
```

**EXHIBIT** 

## ORAL DEPOSITION OF SUSI VASSALLO, M.D.

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some time and go down at some time.
 1
 2
                  So there will be intermittent changes in
 3
    the blood pressure readings, but it's -- I don't -- it's
 4
    my opinion that he had hypertension.
                                           Sometimes the
 5
    blood pressure readings were higher; sometimes they were
 6
    lower depending on the -- on a number of factors.
 7
    in any case, he had hypertension in my opinion.
             Did he have chronic hypertension?
 8
        0
        Α
             Yes.
10
             And in your opinion, if you had been treating
11
    this patient, what medication would you have prescribed?
12
        Α
             Well, the recommendations are to start with a
13
    diuretic such as hydrochlorothiazide.
14
             Do you have any complaint the fact that
15
    Mr. Babbili prescribed hydrochlorothiazide for this
    patient?
16
17
        Α
             No.
18
             While he was at the McLennan County Jail, did
19
    he receive any treatment for diabetes?
20
        Α
             No.
21
             And when he came in to McLennan County, did he
22
    report currently having diabetes?
23
             The medical record does not have diabetes
24
    checked off. Now, I'm not certain as to who was
25
    actually marking that, if it was himself with the chart
```